

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

KATHRYN KNOWLTON, *et al.*,

Plaintiffs,

v.

CASE NO. 20 CV 01660

CITY OF WAUWATOSA, *et al.*,

Defendants.

DEFENDANTS' PROPOSED SCHEDULING ORDER

Pursuant to the Court's Order (ECF# 190), the parties, through their respective counsel, met and conferred on September 12, 2022. Despite efforts to work with Plaintiffs to file a joint proposed schedule as the Court requested—the parties were unable to reach agreement. The parties seemingly agree on the dates for the close of discovery and dispositive motion deadlines but are unable to otherwise agree. As such, the parties are filing separate proposals.

Defendants anticipate conducting one deposition of Plaintiff William Rivera.

Plaintiffs anticipate conducting seven or eight additional depositions. At the time of the meet and confer on September 12, 2022, the Plaintiffs could only identify Defendant Farina and "the City" as two of those additional deponents. Defendants do not object to Defendant Farina being deposed; however, Defendants anticipate objecting to any additional deponents based on the number of depositions previously conducted by Plaintiffs (15) and the limited claims remaining.

All parties agree that depositions may be conducted via zoom (or similar) technology and the parties reserved the dates of October 18, 19 and 20, 2022, upon which to conduct depositions.

Parties anticipate propounding additional written discovery which will comport with previously ordered discovery limits. (ECF # 99)

Parties will update each other as to discovery responses they believe to be outstanding and related to remaining claims by Monday, September 19, 2022, and the parties will provide a response by September 27, 2022.

The parties respectfully propose the following Amended Scheduling Order deadlines:

1. All requests for discovery must be served by a date sufficiently early so that all discovery in this case can be completed no later than November 18, 2022.
2. All dispositive pretrial motions together with briefs are to be filed in accordance with Civil L.R. 56, and no later than December 23, 2022. Such motions shall not be filed prior to the date of completion of discovery.

Dated this 14th day of September 2022.

WIRTH + BAYNARD
Attorneys for Defendants

BY: /s/Kiley B. Zellner
Kiley B. Zellner, WI Bar No. 1056806
9898 W. Bluemound Road, Suite 2
Wauwatosa, Wisconsin 53226
T: (414) 291-7979 / F: (414) 291-7960
Email: kbz@guntalaw.com